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March 30, 1998

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, DC 20554

Re: Reply Comments to Petition for Waiver of the American  
Samoa Government and the American Samoa  
Telecommunications Authority; CC Docket No. 96-45;  
AAD/USB File No. 98-41

Dear Ms. Salas:

On behalf of the American Samoa Government, we are enclosing for  
filing an original and five copies of American Samoa's and American Samoa  
Telecommunications Authority's Reply Comments in the proceeding listed above.  
Please call the undersigned if you have any questions regarding this filing.

Respectfully submitted,



David L. Sieradzki  
Cindy D. Jackson  
Counsel for American Samoa  
Government

Enclosures  
cc: Attached service list

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List A B C D E

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
American Samoa Government and the	)	
American Samoa Telecommunications	)	
Authority	)	
	)	
Petition for Waivers and Declaratory Rulings to	)	CC Docket No. <u>96-45</u>
Enable American Samoa to Participate in the	)	AAD/USB File No. 98-41
Universal Service High Cost Support Program	)	
and the National Exchange Carrier Association	)	
Pools and Tariffs	)	

**REPLY COMMENTS OF THE  
AMERICAN SAMOA GOVERNMENT AND THE  
AMERICAN SAMOA TELECOMMUNICATIONS AUTHORITY**

Petitioners American Samoa Government ("ASG") and the American Samoa Telecommunications Authority ("ASTCA"), by counsel, hereby submit their reply to the comments filed in this proceeding by the National Exchange Carriers Association ("NECA") and American Samoa Telecom, LLC ("AS Telecom"). In light of NECA's expertise in administering its own pools and tariffs, and its experience on issues involving universal service high-cost support, NECA's comments in support of the Petition should be accorded substantial weight. The other commenting party, AS Telecom, does not oppose the Petition.

Petitioners agree with AS Telecom that the Commission should take care to avoid putting future telecommunications competitors at a competitive disadvantage. And as ASTCA takes the necessary steps to implement the Commission's Part 32 and other related rules in order to prepare for entry into

NECA, all relevant cost information -- including much of what AS Telecom seeks -- will be gathered and will be available, if necessary, for review in due course.

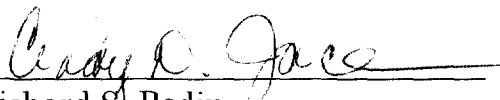
On the other hand, AS Telecom's specific data request appears to be burdensome, duplicative, and unnecessary. As NECA states, "[a]lthough ASTCA will not be submitting actual data immediately, ASTCA's proposed true-up mechanism will permit actual data to be incorporated as soon as possible. Under these circumstances, it seems reasonable to use current data as a surrogate for 1996 costs." NECA Comments at 5.

Contrary to the comments of AS Telecom, the issue of American Samoa's participation in the North American Numbering Plan ("NANP") is ripe for decision in the rate integration proceeding, CC Docket No. 96-61, and is not relevant here. There is no relationship between the numbering plan used in American Samoa and the ability of ASTCA to provide access service -- that is, to originate and terminate long-distance traffic. Nor does the NANP issue have any relationship to ASTCA's ability to receive universal service high cost support or to participate in NECA's pools.

For the foregoing reasons and for the reasons stated in the Petition,  
ASG and ASTCA respectfully request that the Petition be granted expeditiously.

Respectfully submitted,

AMERICAN SAMOA GOVERNMENT AND  
AMERICAN SAMOA TELECOMMUNICA-  
TIONS AUTHORITY

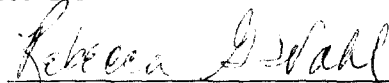
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Their Attorneys

Dated: March 30, 1998

## CERTIFICATE OF SERVICE

I, Rebecca G. Wahl, hereby certify that on this 30th day of March, 1998, a copy of the enclosed Reply Comments of the American Samoa Government and the American Samoa Telecommunications Authority was hand delivered to the parties listed below, except as indicated by asterisks.



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